United States District Court Eastern District of Tennessee At Chattanooga

Ecolab, Inc. and Nalco Company, LLC d/b/a Nalco Water, an Ecolab Company and/or Nalco Water

No. 1:22-CV-00050

Plaintiffs

TRM-SKL

v.

Anthony Ridley and ChemTreat

Defendants

Anthony Ridley's Motion to Exclude Trade Secrets Damages Opinions of Dana M. Trexler

Comes now the Defendant, Anthony Ridley, by and through counsel, and moves the Court to exclude the testimony of Dana M. Trexler related to Plaintiffs' alleged damages related to Count I and Count II for the same reasons as those stated by ChemTreat in its Motion to Exclude [Doc. 266] and Memorandum in Support [Doc. 267]. Mr. Ridley joins and incorporates by reference the arguments raised by ChemTreat in its Motion and Memorandum and would respectfully show that he is entitled to the same relief for the same reasons.

WHEREFORE, premise considered, Mr. Ridley prays that this Honorable Court enter an order consistent with the relief requested by ChemTreat in its Motion and Memorandum and that Mr. Ridley receive the same relief.

Respectfully Submitted:

Patrick, Beard, Schulman & Jacoway, P.C.

By: /s/ Lance W. Pope Lance W. Pope, BPR No. 025054 Jeremy M. Cothern, BPR No. 027116 537 Market Street, Suite 300 Chattanooga, TN 37402 (423) 756-7117 – phone (423) 267-5032 - faxlpope@pbsjlaw.com jcothern@pbsjlaw.com

Certificate of Service

I certify that on May 25, 2023, this document has been served upon all the parties via the Court's ECF system.

By: /s/ Lance W. Pope